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May 22, 2014

VIA ECF

Hon. Jesse Furman
United States District Judge
U.S. District Court, Southern District of New York
40 Centre Street, Courtroom 1105
New York, New York 10007

Re: *Ojeda v. Viacom, Inc., et al/* Case No. 13 CIV 5658

Your Honor:

We represent the defendants Viacom Inc., MTV Networks Music Production Inc. and MTV Networks Enterprises Inc. (“Defendants”). We write to respectfully request a 21-day extension of time in which to produce the physical addresses and e-mail addresses of potential opt-in plaintiffs. Under the Court’s May 5, 2014 Order, Defendants are to produce this information by June 4, 2014; Defendants respectfully request an extension of that date to June 25. Counsel for the plaintiffs has consented to this request.

As set forth in Defendants’ May 2, 2014 letter filing, the personal information of all potential opt-in plaintiffs (which includes interns from locations throughout the United States in a multitude of programs, many of which maintained their own records concerning the interns they hosted) is not maintained in a centralized electronic database. Since entry of the Court’s May 5, 2014 Order, Defendants have been diligently retrieving and compiling the contact information for the potential opt-in plaintiffs, and have hired a number of short-term employees to assist in these efforts. However, due to the sheer scope of the retrieval and compilation process (which involves the manual review of resumes and entry of relevant contact information into an electronic database), Defendants respectfully request a three-week extension of time in which to produce the potential opt-in plaintiffs’ contact information.

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We thank the Court in advance for its attention to this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Michael Goettig', with a large, stylized initial 'M'.

Michael Goettig

MG

cc: Lloyd Ambinder, Esq.